

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

INTELLECTUAL VENTURES I LLC and)	
INTELLECTUAL VENTURES II LLC,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 10-1066 (SLR-MPT)
)	
HYNIX SEMICONDUCTOR INC., HYNIX)	
SEMICONDUCTOR AMERICA INC.,)	
ELPIDA MEMORY, INC. and ELIPDA)	
MEMORY (USA) INC.,)	
)	
Defendants.)	

STIPULATION AND [PROPOSED] ORDER OF DISMISSAL WITHOUT PREJUDICE

Plaintiffs Intellectual Ventures I LLC and Intellectual Ventures II LLC (collectively, “IV”), and Defendants Hynix Semiconductor Inc.¹ and Hynix Semiconductor America Inc. (collectively, “Hynix”), having settled their dispute in this action by entering into a patent license agreement, hereby agree to dismiss without prejudice all claims asserted between IV and Hynix in this action. Each side shall bear its own costs, expenses and attorneys’ fees.

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Hynix Semiconductor America Inc.*

¹ The company’s corporate headquarters are now referred to as SK Hynix, Inc.

SO ORDERED this _____ day of _____, 2012.

The Honorable Sue L. Robinson